IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA	
Plaintiff,	Criminal no. 19-647 (RAM)
V.	
EDGARDO SANCHEZ SOSA (1)	
Defendant.	

MOTION REQUESTING MODIFICATION OF RELEASE CONDITIONS

TO THE HONORABLE COURT:

Comes now the defendant, Mr. Sanchez Sosa, and respectfully states and prays as follows:

- 1. Mr. Sanchez Sosa is currently on bond pending the resolution of his criminal matter.
- 2. This Court has granted his previous requests for modifications to the release conditions for various reasons.
- 3. Mr. Sánchez Sosa is requesting authorization to travel from his location to Canóvanas on Saturday, February 15, 2020, to inspect a worksite and to submit a work proposal for the installation of an electric equipment. Furthermore, that day has been contracted to repair a water cistern located in that same town.
- 4. Due to the distance of these opportunities and because of the traffic that generally is present on the highway on the weekend, Mr. Sánchez Sosa request that his schedule starts at 7:00 am, until 6:30 pm.

WHEREFORE, it is respectfully requested that this Honorable Court authorize Mr. Sanchez Sosa to accomplish these tasks on Saturday, February 15, 2020, and adjusting his schedule from 7:00 am – 6:30 pm.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10th day of February, 2020.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and will be available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office, or the public.

s/ Diego H. Alcalá Laboy
Diego H. Alcalá Laboy
P.O. Box 12247
San Juan, PR 00914
Tel.: (787) 432-4910
USDC-PR No. 300504
dalcala@defensorialegal.com